

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION, :
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Plaintiff, : **20 Civ. 10832 (AT) (SN)**
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- against - : **ECF Case**
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:
RIPPLE LABS, INC., BRADLEY GARLINGHOUSE, :
and CHRISTIAN A. LARSEN, :
:
:
Defendants. :
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:
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DECLARATION OF MICHAEL SEAMAN

I, Michael Seaman, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am Acting Chief Counsel in the Division of Corporation Finance (“Corp Fin”) of the Securities and Exchange Commission (“Commission” or “SEC”). I oversee the work of the Office of Chief Counsel, which provides legal advice to Corp Fin. I have been employed by the Commission in this capacity since October 2021.

2. From May 2016 to May 2021, I was Senior Special Counsel to the Director of Corp Fin. My primary responsibilities included advising the Director on legal and policy issues.

3. During meetings, it is my practice not to transcribe everything discussed at the meeting, but rather to write down information that I deem important.

4. On April 6, 2018, I attended a meeting with Professor Christian Catalini, a faculty member at Massachusetts Institute of Technology, and several Commission staff. True and accurate copies of my handwritten notes from this meeting are attached hereto as Exhibit A.

5. That meeting concerned a digital asset and provided me with factual information about the digital asset so that I could assist staff within Corp Fin in formulating its position regarding the status of the digital asset under the federal securities laws.

6. During the April 6 meeting, several Commission staff gathered in a conference room at our office and Professor Catalini and at least one Commission staff participated via telephone. *See* Ex. A at p. 1. To the best of my knowledge, the highlighted portions of the notes in Exhibit A reflect internal communications among Commission staff that Professor Catalini was not a party to.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 18, 2022 in, Chevy Chase, Maryland.



Michael Seaman